

**OUTTEN & GOLDEN LLP**

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ERIC GLATT, ALEXANDER FOOTMAN,  
EDEN ANTALIK, and KANENE GRATTS, on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

FOX SEARCHLIGHT PICTURES INC. and  
FOX ENTERTAINMENT GROUP, INC.,

Defendants.

No. 11 Civ. 6784 (WHP) (AJP)

**SUPPLEMENTAL DECLARATION OF RACHEL BIEN IN  
FURTHER SUPPORT OF PLAINTIFF'S MOTION FOR  
CLASS CERTIFICATION AND COURT-AUTHORIZED NOTICE**

I, Rachel Bien, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am a partner at Outten & Golden LLP ("O&G"), Plaintiffs' attorneys in this case.
2. I am an attorney in good standing admitted to practice in the State of New York and before this Court.
3. I make this declaration in further support of Plaintiff's Motion for Class Certification and Court-Authorized Notice. I have personal knowledge of the matters set forth herein and would so testify if called as a witness at trial.

**Exhibits**

4. Attached as **Exhibit 83** is a true and correct copy of excerpts from the deposition transcript of David Johnson, dated December 13, 2012 (“Johnson Tr.”).

5. Attached as **Exhibit 84** is a true and correct copy of excerpts from the deposition transcript of Linda Johns, dated January 18, 2013 (“Johns Tr.”).

6. Attached as **Exhibit 85** is a true and correct copy of excerpts from the deposition transcript of John Maybee, dated August 9, 2012 (“Maybee Tr.”).

7. Attached as **Exhibit 86** is a true and correct copy of excerpts from the transcript of the Court conference before Judge Peck, dated October 23, 2012 (“Ct. Tr. Oct. 23, 2012”).

8. Attached as **Exhibit 87** are true and correct copies of emails between Jill Gwen Braginets and interns (“Braginets emails”).

9. Attached as **Exhibit 88** are true and correct copies of emails between Aimee Hoffman and John Maybee (“Emails bet. Hoffman and Maybee”), bearing Bates numbers, D0049699-700, D0049723-24.

10. Attached as **Exhibit 89** is a true and correct copy of a communication from Searchlight to Former Fox Searchlight Interns (“Searchlight Email”), bearing Bates number, D0086835.

11. Attached as **Exhibit 90** are true and correct copies of Intern Request Forms (“Martinez Intern Request Forms”), bearing Bates numbers, D0048766-67, D0049180, D0078025-26.

12. Attached as **Exhibit 91** is a true and correct copy of an email, dated February 17, 2010, from Aimee Hoffman to Intern Supervisors with the recipient list (“Hoffman email, dated Feb. 17, 2010), which was marked as Exhibits 7A and 7B in the deposition of David Johnson.

13. Attached as **Exhibit 92** is a true and correct copy of an Intern Request Form for the TCF Accounting Department (“Vyduna Intern Request Form”), bearing Bates numbers, D0093023-24.

14. Attached as **Exhibit 93** is a true and correct a copy of an Intern Request Form for the New York Publicity Department (“NY Intern Request Form”), bearing Bates numbers, D0065630-31.

15. Attached as **Exhibit 94** is a true and correct copy of an offer letter, dated May 11, 2010 (“Grammatke Offer Letter”), bearing Bates number, D0092930.

16. Attached as **Exhibit 95** are true and correct copies of offer letters for the Searchlight New York Publicity Department (“NY Offer Letters”).

17. Attached as **Exhibit 96** is a true and correct copy of an Intern Request Form for the TCF Casting Department (“Kasabian Intern Request Form”), bearing Bates numbers, D0093137-38.

18. Attached as **Exhibit 97** is a true and correct copy of an Intern Request Form for the FEG Photo Archive Department (“Thompson Intern Request Form”), bearing Bates numbers, D0093120-21.

19. Attached as **Exhibit 98** is a true and correct copy of an Intern Request Form for the FEG Accounting Department (“Hicks Intern Request Form”), bearing Bates number, D0093092.

20. Attached as **Exhibit 99** is a true and correct copy of an Intern Request Form the for FEG Media Promotions Department (“Marks Intern Request Form”), bearing Bates number, D0093110.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 12, 2013  
New York, NY

/s/ Rachel Bien  
Rachel Bien

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